

Jennifer J. West, Esquire (VSB #47522)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000 Fax: (804) 697-2100
jwest@spottsfain.com

HERRICK, FEINSTEIN LLP
Stephen B. Selbst
Two Park Avenue
New York, NY 10016
(212) 592-1400
(212) 592-1500 (fax)
sselbst@herrick.com

Attorneys for Muffy Flouret, as Trustee of the MP 1291 Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

-----X

In re:

Chapter 11

PAPER SOURCE, INC.
A/K/A WASTE NOT PAPER, et al.,¹

Case No. 21-30660 (KLP)

Debtors

(Jointly Administered)

-----X

**OBJECTION AND JOINDER OF MUFFY FLOURET, AS TRUSTEE OF THE MP 1291
TRUST TO OBJECTION OF OTHER LANDLORDS TO THE DEBTORS' MOTION
FOR ENTRY OF AN ORDER (A) EXTENDING TIME FOR PERFORMANCE OF
OBLIGATIONS ARISING UNDER UNEXPIRED NON-RESIDENTIAL REAL
PROPERTY LEASES AND (B) GRANTING RELATED RELIEF**

Muffy Flouret, as Trustee of the MP 1291 Trust (the “**Landlord**”) hereby files this objection and joinder (the “**Objection and Joinder**”) to the various objections filed by the other landlords and creditors, including, without limitation, ECF Nos. 166, 167, 168, 170, 171, concerning the Debtors’ *motion for entry of an order (A) extending time for performance of*

¹ The Debtors in these chapter 11 cases, along with the last four of each Debtor’s federal tax identification number, are: Pine Holdings, Inc. (4460) and Paper Source, Inc. (8035). The Debtors’ service address is 125 South Clark St., Chicago, IL 60603

obligations arising under unexpired non-residential real property leases and (B) granting related relief [ECF No. 20] (the “**Motion**”) and respectfully states as follows:

1. The Landlord incorporates by reference and joins in the arguments and requests for relief set forth in the various objections filed by the other landlords and creditors, including, without limitation, ECF Nos. 166, 167, 168, 170, 171, concerning the Debtor’s Motion as if those arguments and requests for relief are restated in full in this Joinder and Objection.

2. The Landlord respectfully requests that any relief that is granted to the other landlords be extended to the Landlord.

Dated: March 18, 2021

MUFFY FLOURET,
AS TRUSTEE OF THE MP 1291 TRUST

By: /s/ Jennifer J. West

Jennifer J. West, Esquire (VSB #47522)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000 Fax: (804) 697-2100
jwest@spottsfain.com

Stephen B. Selbst
2 Park Avenue
New York, NY 10016
sselbst@herrick.com

*Attorneys for Muffy Flouret,
as Trustee of the MP 1291 Trust*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via CM/ECF on this 18th day of March, 2021 to all parties receiving notice in the above-captioned case, constituting all necessary parties.

/s/ Jennifer J. West